STEPHEN L. DEAN, a Minor, et al, Plaintiff, . . Vs. ANSWER AMOS GARRETT, Defendant.

The Defendant, for answer to the Complaint says, that he is not guilty of the matters therein averred.

Attorney for Defendant

COURT OF	ALABAMA	
CI RCULT	COUNTY	AT LAW
IN THE	BALDWIN	

STEPHEN L. DEAN, a Minor, et al,

Plaintiff,

vs.

AMOS GARRETT,

Defendant.

ANSWER

LLOYD A. MAGNEY Attorney Foley, Alabama. STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU ARE HEREBY COMMANDED to summon AMOS GARRETT, to appear within thirty days from the service of this writ in the Circuit Court to be held for said County at the place of holding the same, then and there to answer the Complaint of STEPHEN LEE DEAN, a minor, by MILTON A. DEAN, his father and next friend.

Witness my hand this the Laday of January, 1943.

STEPHEN LEE DEAN, a minor, By MILTON A. DEAN, his father and next friend,

PLAINTIFF,

VS.

AMOS GARRETT, DEFENDANT.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW.

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1.

The Plaintiff claims of the Defendant the sum of FIVE THOU-SAND (\$5000.00) DOLLARS damages, for that heretofore on to-wit, May 3, 1942, the Plaintiff was riding as a guest in an automobile driven by the Defendant along Highway # 31, a public highway, at a point approximately five miles south of Evergreen in Escambia County, Alabama; that at said time and place the Defendant willfully and wantonly injured the Plaintiff by so operating said automobile as to cause it to run off the road and overturn, and as a proximate result thereof the Plaintiff was injured as follows: he was scratched and bruised; his head was crushed; he suffered concussion of the brain; he was otherwise injured; he was permanently injured.

The Plaintiff alleges that his damages and injuries were the

proximate result of the negligence of the Defendant in and about the operation of the automoible which he was driving and in which Plainfiff was riding.

2.

The Plaintiff claims of the Definedant FIVE THOUSAND (\$5000.00) DOLLARS, as damages, that on to-wit: May 3, 1942, the Defendant want-only or willfully injured the Plaintiff by causing or allowing an auto-mobile which he was driving on or along Highway # 31 at a point approximately five miles south of Evergreen in Escambia County, Alabama, and in which the Plaintiff was riding as a guest, to leave the highway and overturn thereby severely injuring the Plaintiff as follows: he was scratched and bruised; his head was crushed; he suffered concussion of the brain; he was otherwise injured; he was permanently injured.

The Plaintiff alleges that his damages and injuries were the proximate result of the negligence of the Defendant in and about the operation of the automobile which he was driving and in which Plaintiff was riding.

BEEBE & HALL

By: Attorneys for Plaintiff.

Plainty demands a

Hall

Plaintiff,

by serting copy of within Summons and

Complaint on

Executed Whin

this_2_day of Quzz_, 194 3 W. R. STUART, Sheriff

AMOS CARRETT,

Sheriff.

Deputy Sheriff

March 13, 1943

THE STATE OF ALABAMA	•		·CIRC	UIT COURT	
BALDWIN COUNTY	Case No. 798.		April.	Term	194_2
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any Sheriff of the State of Alabama, GI	REETING:	•	i		•
	A det s	• •	i i i i i i i i i i i i i i i i i i i	i,	
You are hereby commanded to summon	J C Hyde.	Rfd	Evergreen.	Ala.	
Tou are nereby commanded to summon-	•				
	Highway				
be found in your County, at the instanc	e of the		·		
e and appear before the honorable, the Ju	idgo of the Circuit C	ourt of Baldys	in County at the	Court House	there
e and appear before the nonorable, the Ju	tage or the Circuit C	our tor Datum	in Country, at the	e Court i i i ouse	· · · · ·
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8 30 o'clock of the forenoon, on the	<u>13th</u> day of	April.		······································	1943
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and the second s		The second second		Special Company of the Company of th	***************************************
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from day to day and term to term of	of said Court until	discharged by	law, then and t	there to testi	***************************************
8 30 or o'clock of the forenoon, on the from day to day and term to term of truth to say, in a certain cause pending	of said Court until	discharged by	law, then and t	there to testi	fy, and
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from day to day and term to term of truth to say, in a certain cause pending Amos Garrett.	of said Court until	discharged by	law, then and t	there to testi	fy, and
from day to day and term to term of truth to say, in a certain cause pending Amos Garrett. Herein fail not and have you then and	of said Court until	discharged by ephen Lee —Defendant.	law, then and t	there to testi	fy, and
from day to day and term to term of truth to say, in a certain cause pending Amos Garrett.	of said Court until	discharged by ephen Lee —Defendant.	law, then and t	there to testi	fy, and
from day to day and term to term of truth to say, in a certain cause pending Amos Garrett. Herein fail not and have you then and	of said Court until	discharged by ephen Lee —Defendant.	law, then and t	there to testi	fy, and

Received in office thisday of	ORIGINAL	
	No. 798 Page	
SHERIFF	THE STATE OF ALABAM Baldwin County	
have executed this writ	CIRCUIT COURT	
3/30/43	Stephen Lee Dean.	
	Plaintiff VS.	
	Amos Garrett,	
•		
	CIVIL SUBPOENA	
	Issued this 29th day of	
1. A Moore	March. 1943	
SHERIFF	Clerk.	

EVERGREEN ALA.

VIL SUBPOENA—ORIGINAL—In case witnes Subpoena, or within five days after adjournn		e shall produce to the Cler Times Prtg. Co.	
THE STATE OF ALABAMA BALDWIN COUNTY	Case No. 798	April CO	OURT Ferm, 194₹
any Sheriff of the State of Alabama, C	REETING:		
You are hereby commanded to summo	Mrs. W. C. T stock, Robert	7/2 Gowa todale	en_
o be found in your County, at the instan	ice of the Assert	dant	
e and appear before the honorable, the J	Judge of the Circuit Court of Baldwin	n County, at the Court I	House there-
oy \$.300 o'clock of the forenoon, on th	e 13th day of Up	rile	, 194 <u>-</u> 3
from day to day and term to term	of said Court until discharged by	law, then and there to	testify, and
truth to say, in a certain cause pendir			Plaintiff
Dr. amos Gar	rellDefendant.	**	
Herein fail not and have you then a	nd there this Writ.		
Given under my hand and seal, this	1th day of Op	ril	194-3
	75. D	sche_	Clerk
		· .	

Received in office thisday of	ORIGINAL
194	No. 798 Page
	THE STATE OF ALABAMA
SHERIFF	Baldwin County
I have executed this writ	CIRCUIT COURT
In serving Capy	Stephen Dean
+ JG Constock	<u> </u>
	Plaintiff VS.
	- umpo parren-
	Defendant
	CIVIL SUBPOENA
	Issued this 7th day of
u & Stunt	R.S. Ducke
SHERIFF	Clerk.

THE STATE OF ALABAMA)		CIRCUIT	COURT	
BALDWIN COUNTY	Case No	98 798,	April.	Term,	194_3
o any Sheriff of the State of Alabama, Gl	REETING:				
You are hereby commanded to summon	Dr Holly	•			•
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de la companya de la	f 43- P7	t.f.			
to be found in your County, at the instance	ce of the	· O 4. &		······································	
be and appear before the honorable, the Ju	idea of the Circui	it Court of Raldwin	County at the Co	urt House	thorn
be and appear before the nonorable, the ac	auge of the Chron	it Court of Daidwif.	County, at the Ce	ourt mouse	mere-
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by 8 30 clock of the forenoon, on the	13thday	of April.		, 19	94-3-
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nd from day to day and term to term o	of said Court un	til discharged by l	gang and a graph and and a graph and a		
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ne truth to say, in a certain cause pending	g, wherein <u>Ste</u>	phen Lee Des	aw, then and the	e to testif	y, and
ne truth to say, in a certain cause pending	g, wherein_Ste	phen Lee Dea: Defendant.	aw, then and the	e to testif	y, and
nd from day to day and term to term of the truth to say, in a certain cause pending and Amos Garre. Herein fail not and have you then an	g, wherein_Ste	phen Lee Dea: Defendant.	aw, then and the	e to testif	y, and
ne truth to say, in a certain cause pending and Amos Garre. Herein fail not and have you then an	g, wherein_Ste	phen Lee Dea:Defendant. it.	aw, then and the	e to testif	y, and
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ne truth to say, in a certain cause pending and Amos Garre. Herein fail not and have you then an	g, wherein_Ste	phen Lee Dea:Defendant. it.	aw, then and the	e to testif	y, and aintiff

Received in office thisday of	ORIGINAL
194	No.798, Page
SHERIFF	THE STATE OF ALABAMA Baldwin County
ave executed this writ	CIRCUIT COURT
ming in full	Stephen Lee Pean.
	Plaintiff VS.
e	Amos Garrett,
	f
	CIVIL SUBPOENA
4	Issued this 7th day of
WR Storant	April 1943
SHERIFF	Clerk.

Brewton. Ala.

THE STATE OF ALABAMA	`)	CIRCUIT COURT		
BALDWIN COUNTY	Case No. 798.	April.		Γerm, 194—
GI 100 C I GI C I C I C I C I C I C I C I C I			:	
any Sheriff of the State of Alabama, GR	EETING:			
		:	• •	
You are hereby commanded to summon-	Clifford Hyde.			
	: -			
o be found in your County, at the instance	e of th Pltf ,			:
			:	
e and appear before the honorable, the ${f J}$ uc	dge of the Circuit Court of Baldwi	in County, at	the Court I	Iouse there-
	• • • • • • • • • • • • • • • • • • •			
ov8 30 o'clock of the forenoon, on the	7 7562			
	day of April			194 z
The second secon	day of April.			—, 194 <u> </u>
	13thday of April. said Court until discharged by			
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from day to day and term to term of	said Court until discharged by	law, then an	d there to	testify, and
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truth to say, in a certain cause pending, Amos Garrett. Herein fail not and have you then and	said Court until discharged by wherein Stephen Lee Defendant. there this Writ.	law, then an	d there to	testify, and ——Plaintiff
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truth to say, in a certain cause pending, Amos Garrett. Herein fail not and have you then and	said Court until discharged by wherein Stephen Lee Defendant. there this Writ.	law, then an	d there to	testify, and ——Plaintiff
from day to day and term to term of truth to say, in a certain cause pending, Amos Garrett. Herein fail not and have you then and	said Court until discharged by wherein Stephen Lee Defendant. there this Writ.	law, then an	d there to	testify, and ——Plaintiff ——194—3
truth to say, in a certain cause pending, Amos Garrett. Herein fail not and have you then and	said Court until discharged by wherein Stephen Lee Defendant. there this Writ.	law, then an	d there to	testify, and ——Plaintiff ——194—3

vs.	
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Pla VS.	
vs.	
c j	ntiff
Amos Garrett.	·
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Defen	dant
CIVIL SUBPOE	N A
Issued this 7th	ay of
April. Ray	1943_
SHERIFF	